

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VISHVA DESAI on behalf of herself and others)	
similarly situated,)	1:11-cv-1925
Plaintiff,)	
)	Judge Bucklo
v.)	Magistrate Judge Keys
)	
ADT SECURITY SERVICES, INC.,)	
Defendant.)	JURY DEMANDED
)	

PLAINTIFF'S UNOPPOSED MOTION TO BEGIN THIRD PARTY DISCOVERY

Plaintiff respectfully requests that the Court enter an order permitting her to initiate third party discovery in this case. Defendant does not oppose this motion. In support, plaintiff states:

1. This is a Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"), case that alleges defendant ADT Security Systems, Inc. or agents thereof engaged in impermissible advertising through use of autodialers and prerecorded messages.

2. Plaintiff wishes to initiate third party discovery to telephone companies in order to determine from whom specifically the call to plaintiff's cell phone originated, before the Fed.R.Civ.P. 26(f) meeting. Plaintiff is concerned about the possibility of inadvertent destruction of relevant records by third party telephone companies.

3. Defendant does not oppose this motion, and has indicated that it wishes to "reserve its rights" as to other discovery issues not currently before the Court.

WHEREFORE, plaintiff respectfully requests that the Court enter an order permitting her to initiate third party discovery in this case, to the extent set forth in this motion. Defendant does not oppose this motion.

Respectfully submitted,

/s/Alexander H. Burke

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